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6 *Dental Group P.C. and Interdent Service*
Corporation

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 RACHELL A. JACOBSON f/k/a RACHELL
11 A. RHEIN, individually,

12 Plaintiff,

13 vs.

14 PETERSON DENTAL GROUP, P.C., f/d/b/a
CRESSMAN DENTAL GROUP P.C., a
15 domestic professional corporation;
INTERDENT SERVICE CORPORATION, a
16 foreign corporation; DOES I-X; and ROE
BUSINESS ENTITIES I-X, inclusive,

17 Defendants.
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Case No. 2:25-cv-01098-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(SECOND REQUEST)

19 IT IS HEREBY STIPULATED by and between Plaintiff Rachell A. Jacobson f/k/a
20 Rachell A. Rhein ("Plaintiff"), by and through her counsel, Maier Gutierrez & Associates, and
21 Defendants Peterson Dental Group, P.C., f/d/b/a Cressman Dental Group P.C. and Interdent
22 Service Corporation ("Defendants"), by and through their counsel, the law firm of Jackson Lewis
23 P.C., that Defendants shall have a 2-week extension up to and including **August 14, 2025**, in
24 which to file their response to Plaintiff's Complaint. This Stipulation is submitted and based upon
25 the following:

26 1. Defendants Peterson Dental Group, P.C., f/d/b/a Cressman Dental Group P.C. and
27 Interdent Service Corporation were served with the Summons and Complaint on June 25, 2025,
28 (ECF No. 1) making Defendants' response to Plaintiff's Complaint originally due on July 17,

1 2025.

2 2. The Parties stipulated and this Court granted a two-week extension to file a
3 response to the Complaint by July 31, 2025 as Defendants' counsel was recently retained and in
4 the process of investigating Plaintiff's allegations which included significant monetary damages,
5 including, punitive damages.

6 3. Undersigned Defense Counsel has been unexpectedly out of the office due to a
7 family emergency since July 23, 2025, and as a result has been delayed in meeting the current
8 July 31 deadline. On request for Defense Counsel, Plaintiff has kindly agreed to one additional
9 two-week extension.

10 4. The Parties have agreed to extend the deadline for Defendants to file their
11 response(s) to Plaintiff's Complaint for one additional two-week period, **to August 14, 2025**, to
12 allow Defendants sufficient time to address the allegations within the Complaint.

13 5. This is the second stipulation to extend the time for Defendant to respond to
14 Plaintiff's Complaint.

15 6. The Parties believe these circumstances constitute good cause for granting an
16 extension. *See* Fed. R. Civ. P. 6(b)(1).

17 7. This Stipulation is made in good faith and not for the purpose of delay.

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1 8. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair
2 any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation
3 and Order shall be construed as an admission of or consent to the merit or validity of any claim,
4 defense, objection, or right by any party in this case.

5 Dated this 30th day of July, 2025.

6 MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

7 /s/ Danielle J. Barraza

/s/ Deverie J. Christensen

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Rachell A. Rhein

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Peterson Dental Group, P.C., f/d/b/a Cressman
Dental Group P.C. and Interdent Service
Corporation

12 **ORDER**

13 IT IS SO ORDERED.

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16 Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Date: 8/1/2025
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